

1 **PHILIP J. TRENCHAK, ESQ.**

Nevada Bar No. 9924

2 **MULLINS & TRENCHAK, ATTORNEYS AT LAW**

3 1614 S. Maryland Pkwy

4 Las Vegas, Nevada 89104

5 Tel: (702) 778-9444

6 Fax: (702) 778-9449

7 E-mail: phil@mullinstrenchak.com

Attorneys for Plaintiff/Counter-Defendant

8 -AND-

9 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

10 E-mail: jfoley@hkm.com

HKM EMPLOYMENT ATTORNEYS LLP

11 1785 East Sahara, Suite 300

12 Las Vegas, Nevada 89104

13 Tel: (702) 805-8340

14 Fax: (702) 805-8340

15 E-mail: jfoley@hkm.com

Attorneys for Plaintiff/Counter-Defendant

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 KATELYN WHITTEMORE, an
17 individual,

18 Plaintiff,

19 vs.

20 ANDREW "TOBY" MATHIS, an
21 individual, CLINT COONS, an individual,
22 MICHAEL BOWMAN, an individual,
23 RAYMOND "KENNER" FRENCH, an
24 individual, VAST HOLDINGS GROUP,
25 LLC, doing business as a Nevada limited-
26 liability company; ANDERSON
27 FINANCIAL SERVICES, LLC, doing
28 business as a foreign Washington limited-
liability company; VAST SOLUTIONS
GROUP, INC., a Nevada Corporation,
VAST FINANCIAL SOLUTIONS, INC., a
Nevada Domestic Corporation;

CASE NO.: 2:19-cv-01951-GMN-EJY

**STIPULATION AND ORDER TO
REPLY TO DEFENDANTS'/
COUNTERCLAIMANTS' RESPONSE IN
OPPOSITION TO
PLAINTIFF'S/COUNTER-
DEFENDANT'S ANTI-SLAPP SPECIAL
MOTION TO DISMISS PURSUANT TO
NRS 41.637**

(FIRST REQUEST)

1 GRAPHENE ADVISORS LLC, a Nevada
2 Limited Liability Company, VAST
3 SOLUTIONS GROUP, LLC, a
4 Washington Limited Liability Company;
and Anderson Investment Consultants,
LLC; DOES 1-100, inclusive.

5 Defendants.

6
7 VAST HOLDING GROUP, LLC, a
8 Nevada
9 limited liability company, VAST
10 SOLUTIONS GROUP, INC., a Nevada
11 Corporation, GRAPHENE ADVISORS
12 LLC, A Nevada Limited Liability Company,
VAST SOLUTIONS GROUP, LLC, A
Washington Limited Liability Company,
RAYMOND “KENNER” FRENCH, an
individual,

13 Counterclaimants,

14 v.

15 KATELYN WHITTEMORE, an individual,
16 and DOES I-X, and ROE
CORPORATIONS I-X, inclusive,

17 Counter-Defendants.

18
19 Plaintiff/Counter-Defendant KATELYN WHITTEMORE (“Plaintiff”) and
20 Defendants/Counterclaimants VAST HOLDINGS GROUP, LLC, VAST SOLUTIONS
21 GROUP, INC., VAST SOLUTIONS GROUP, LLC, VAST FINANCIAL SOLUTIONS, INC.,
22 GRAPHENE ADVISORS, LLC, ANDERSON INVESTMENT CONSULTANTS, LLC AND
23 R. KENNER FRENCH (“Defendants”), by and through their counsel of record, hereby stipulate
24 to extend the deadline for Plaintiff to reply to Defendants’ Response in Opposition to Plaintiff’s
25 Anti-SLAPP Special Motion to Dismiss pursuant to NRS 41.637 (ECF 99), which was filed on
26 May 11, 2021. The parties hereby stipulate and agree as follows:
27
28

1 1. Plaintiff's reply to Defendants' Response in Opposition to Plaintiff's Anti-SLAPP
2 Special Motion to Dismiss pursuant to NRS 41.637 (ECF 99) is currently due on May 18, 2021.

3 2. In order to avoid unnecessary time and expense in connection with motions to
4 dismiss and other litigation matters pertaining to Defendants' Response in Opposition to Plaintiff's
5 Anti-SLAPP Special Motion to Dismiss pursuant to NRS 41.637 (ECF 99), Plaintiff and
6 Defendants have agreed to extend the time by which Plaintiff shall be required to reply to
7 Defendants' Response in Opposition to Plaintiff's Anti-SLAPP Special Motion to Dismiss
8 pursuant to NRS 41.637 (ECF 99) by a period of two (2) weeks.

9 3. Pursuant to this agreement between the parties, Plaintiff shall be required to file a
10 reply to Defendants' Response in Opposition to Plaintiff's Anti-SLAPP Special Motion to Dismiss
11 pursuant to NRS 41.637 (ECF 99) or before June 8, 2021.

12 4. The parties agree that good cause exists for the request for the extension of the
13 deadline for a reply to Defendants' Response in Opposition to Plaintiff's Anti-SLAPP Special
14 Motion to Dismiss pursuant to NRS 41.637 (ECF 99) for the above-specified reasons.

15
16 ///

17
18 ///

19
20 ///

21
22 ///

23
24 ///

25
26 ///

27
28 ///

5. The parties agree that the requested extension is warranted under the current circumstances and will not result in an undue or significant delay in the administration of this case.

Dated this 26th day of May, 2021.

Dated this 26th day of May, 2021.

HKM EMPLOYMENT ATTORNEYS
LLP

HOLLEY DRIGGS

/s/ Jenny L Foley

/s/ Kristol Bradley Ginapp

Jenny L. Foley, Ph.D., Esq.
Nevada Bar No. 9017
1785 East Sahara Ave., Suite 300
Las Vegas, Nevada 89104

Kristol Bradley Ginapp, Esq.
400 South Fourth Street, 3rd Floor
Las Vegas, NV 89101

Philip J. Trenchak, Esq.
Victoria C. Mullins, Esq.
MULLINS & TRENCHAK,
ATTORNEYS AT LAW
1614 S. Maryland Parkway
Las Vegas, NV 89104

*Attorneys for Defendants
Vast Holdings Group, LLC,
Vast Solutions Group, Inc.,
Vast Solutions Group, LLC,
Vast Financial Solutions, Inc.,
Graphene Advisors, LLC, and
R. Kenner French*

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED *nunc pro tunc*.

Dated this 3 day of [REDACTED], 2021.

Gloria M. Navarro, District Judge
United States District Court